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April 14, 2021

VIA ECF

The Honorable Alison J. Nathan
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Yury Mosha, 21 CR 92 (AJN)

Dear Judge Nathan,

I write on behalf of the defendant, Yury Mosha, in the above-referenced case to request a modification of the conditions of his release. Specifically, we are respectfully requesting that Mr. Mosha be permitted to drop-off and pick-up his four-year-old and two-year-old daughters from daycare. This request for movement would allow Mr. Mosha to leave his residence Monday through Friday at 8:00am until 9:30am and then again from 5:00pm until 6:30pm. Although there certainly are closer daycare facilities that Mr. Mosha's daughters can attend, his eldest daughter suffers from a sensory processing disorder. Because of the difficulties and nuances in caring for such a child, it is important to keep her in an environment that she is familiar with and that has caretakers that are knowledgeable of her needs and idiosyncrasies.

For the purposes of privacy, I am withholding the name and location of the daycare facility that Mr. Mosha's daughters attend. Should this requested modification of the conditions of his release be granted, I will certainly provide the name, location, and any other contact information necessary to the Pretrial Services Office and to both this Court and the government, if necessary.

Mr. Mosha was arrested on February 18, 2021 on the instant Superseding Indictment and presented before Magistrate Judge Katharine H. Parker the following

day. Following his initial appearance, Mr. Mosha was released on the following agreed-upon conditions:

- a \$300,000 personal recognizance bond cosigned by four (4) financially responsible persons;
- travel restricted to SDNY/EDNY;
- surrender travel documents and no new applications;
- supervision as directed by Pretrial Services; and,
- home incarceration with GPS monitoring.

Under the current conditions of release, Mr. Mosha is confined to his residence with no movement outside of doctors' and attorneys' visits. Prior to the instant charges, Mr. Mosha was the primary financial provider for his family, with his wife being primarily responsible for all other aspects of their family's lives. The burden has now fallen solely on his wife to not only carry on the responsibilities she shouldered before, but to obtain new employment in an effort to provide for their family. The instant request for modification of the conditions of Mr. Mosha's release is to simply allow Mr. Mosha to relieve his wife from some of the burden that now rests completely on her shoulders.

Mr. Mosha does not request any other modification of the conditions of his release, aside from the specifically carved out time periods referenced above. Furthermore, under the requested modification, his travel would be restricted to the distance between his home and the location of his daughters' daycare. All other conditions of his release are to stay the same. Mr. Mosha understands the seriousness of the charges he is currently facing and is mindful that if he were to violate any of the conditions of his release that this Honorable Court could remand him into custody pending the completion of this matter.

Assistant United States Attorney Jonathan Rebold indicated that he does not object to the requested modifications to Mr. Mosha's conditions of release. Furthermore, Mr. Mosha's supervising Pretrial Services Officer, Bernisa Mejia, indicated that Mr. Mosha has been fully compliant with the current conditions of his release and that she does not object to the requested modification.

Thank you for your consideration.

Respectfully submitted,

Vadim A. Glozman

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cc: Assistant U.S. Attorney Jonathan Rebold (via ECF)
Assistant U.S. Attorney David Felton (via ECF)
Pretrial Services Officer Bernisa Mejia (via email)